

LEWIS BRISBOIS BISGAARD & SMITH LLP

STEVEN G. GATLEY, SB# 155986

E-Mail: Steven.Gatley@lewisbrisbois.com

BRIAN KATOOZI, SB# 321158

E-Mail: Brian.Katoozi@lewisbrisbois.com

650 Town Center Drive, Suite 1400

Costa Mesa, California 92626

Telephone: 714.545.9200

Facsimile: 714.850.1030

Attorneys for Defendant SANTA
BARBARA COUNTY OF
ASSOCIATION OF GOVERNMENTS

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

KENT W. EPPERSON,

Plaintiff,

vs.

SANTA BARBARA COUNTY
ASSOCIATION OF GOVERNMENTS
("SBCAG"),

Defendant.

Case No. 2:23-cv-03039-AB-(MRWx)

**DEFENDANT SANTA BARBARA
COUNTY OF ASSOCIATION OF
GOVERNMENTS' NOTICE OF
MOTION FOR SUMMARY
JUDGMENT PURSUANT TO FRCP
RULE 56**

[Filed Concurrently with Memorandum
of Points and Authorities; Separate
Statement; Declarations; Appendix of
Evidence; and Proposed Order]

Date: January 17, 2025

Time: 10:00 a.m.

Crtrm.: 7B

Pre-Trial Conf: August 1, 2025

Trial Date: August 26, 2025

TO THE COURT, PLAINTIFF AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 17, 2025, at 10:00 a.m., or as soon
thereafter as the matter may be heard in Courtroom 7B of the above-entitled
courthouse, located at 350 West First Street, Los Angeles, CA 90012, Defendant
SANTA BARBARA COUNTY OF ASSOCIATION OF GOVERNMENTS

148789837.1

DEFENDANT SANTA BARBARA COUNTY OF ASSOCIATION OF GOVERNMENTS' NOTICE OF MOTION
FOR SUMMARY JUDGMENT PURSUANT TO FRCP RULE 56

1 (“Defendant” or “Santa Barbara”) will and hereby does move for summary judgment
2 as to Plaintiff KENT W. EPPERSON’s (“Plaintiff” or “Epperson”) claim pursuant to
3 Federal Rule of Civil Procedure 56.

4 **This motion is made following the conference of counsel pursuant to Local**
5 **Rules-Central District of California 7-3 which took place on Monday, October**
6 **28, 2024.** (Declaration of Brian K. Katoozi, ¶4.)

7 Defendant is entitled to summary judgment as to Plaintiff’s sole cause of
8 action for discrimination in employment pursuant to Title VII of the Civil Rights
9 Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender,
10 religion, national origin) because there is no genuine issue of material fact, and
11 Plaintiff has not established, and cannot establish, all elements of this cause of
12 action. Specifically, it’s undisputed that Defendant did not discriminate against
13 Plaintiff during his employment based on his religion, and instead attempted to
14 reasonably accommodate Plaintiff’s alleged religious beliefs.

15 This Motion is based on this Notice of Motion, the Memorandum of Points
16 and Authorities attached hereto, the herewith lodged proposed Statement of
17 Uncontroverted Facts and Conclusions of Law, the Court’s file in this action, the
18 Declaration of Martha Gibbs, the Declaration of Brian K. Katoozi, matters of which
19 this Court must or may take judicial notice, and on such further evidence and
20 argument Defendant may present before or at the hearing on this matter.

21 DATED: November 13, 2024 STEVEN G. GATLEY
22 BRIAN KATOOZI
23 LEWIS BRISBOIS BISGAARD & SMITH LLP

24 By: /s/ Brian Katoozi
25 BRIAN KATOOZI
26 Attorney for Defendant, SANTA
27 BARBARA COUNTY OF
28 ASSOCIATION OF GOVERNMENTS

